

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RACHEL YOUNGER, Individually and as
Administrator of the Estate of NATHANIEL
YOUNGER,

Plaintiff,

v.

ZURICH AMERICAN INSURANCE COMPANY,
ZURICH LIFE INSURANCE COMPANY and UBS
FINANCIAL SERVICES, INC.

Defendants.

Civil Action No.: 11-civ-1173 (TPG)

**STIPULATION TO EXTEND TIME
ANSWER, MOVE OR TO
OTHERWISE PLEAD**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned
attorneys for Plaintiff Rachel Younger and the attorneys for Defendant Zurich Life
Insurance Company ("ZLIC"), that:

1. The time for Defendant ZLIC to answer, plead, or otherwise move with
respect to the complaint shall be extended to (a) May 5, 2011 or, (b) in the event that
Plaintiff serves an amended complaint prior to May 5, 2011, ZLIC shall answer, plead, or
otherwise move with respect to such amended complaint within the time prescribed by
Federal Rule of Civil Procedure 15(a)(3).

2. This stipulation may be filed without further notice with the Clerk of the
Court; and

3. This stipulation does not confer jurisdiction upon Defendant ZLIC; and

4. This stipulation does not waive service of process for Defendant ZLIC;
and

5. This stipulation does not constitute an appearance by Defendant ZLIC; and

6. Defendant ZLIC is specifically reserved the right to present defenses based upon lack of personal jurisdiction, insufficient process, insufficient service of process, and/or any defense permissible pursuant to Rule 12(b) of the Federal Rules of Civil Procedure; and

7. A copy or facsimile copy of this stipulation may be filed with the Court as if it were an original.

Dated: New York, New York
April 19, 2011

<p>LAW OFFICES OF CYE E. ROSS</p> <p>By: <u>Cye E. Ross</u> Cye E. Ross</p> <p>30 Vesey Street Suite 1800 New York, NY 10007 212.732.0843</p> <p><i>Attorney for Plaintiff Rachel Younger</i></p>	<p>WOLLMUTH MAHER & DEUTSCH LLP</p> <p>By: <u>Randall R. Rainer</u> Randall R. Rainer</p> <p>500 Fifth Avenue New York, New York 10110 (212) 382-3300</p> <p><i>Attorneys for Defendant Zurich Life Insurance Company</i></p>
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So Ordered:

Dated: _____

Thomas P. Griesa, USDJ